

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA

v.

MUHAMMAD PAHLAWAN,

Defendant.

Criminal No. 3:24-CR-41 (DJN)

Hon. David J. Novak

Trial Date: May 21, 2025

ADDITIONAL STIPULATIONS

The United States of America, by and through undersigned counsel, and the defendant Muhammad Pahlawan, through counsel, for purposes of trial stipulate as follows:

STIPULATION ELEVEN

Stipulation Regarding Authenticity of Records

Digital Forensic Examiner Karen Offerman of the Federal Bureau of Investigation's Computer Analysis Response Team loaded the extractions from the hard drive into Federal Bureau of Investigation systems using industry standard software. The extractions of these electronic devices are authentic in that they are what they purport to be, and they have been maintained in a proper chain of custody from the time of seizure of the electronic devices, through the time of the extractions of the devices and hard drives, to the time of trial. This stipulation applies to the exhibits admitted in this case from Muhammad Pahlawan's cellular phone and from Mehandi "Mehdi" Hassan's cellular phone.

STIPULATION TWELVE

The United States Navy had reason to believe that the *Yunus* departed Iran on or about January 5, 2024. The Navy assessed with high confidence that the *Yunus* was carrying advanced conventional weaponry to Somalia for follow on shipment to the Houthis. The Navy was following the location of the *Yunus* from January 5, 2024 through January 11, 2024. The Navy also assessed that an interdiction of the *Yunus* would possibly yield lethal aid and would provide intelligence relating to smuggling advanced conventional weaponry in the Arabian Sea. On January 11, 2024, the United States Central Command Navy forces conducted a flag verification boarding of the *Yunus*. The interdiction was conducted, in part, to disrupt lethal aid illicit smuggling to the Houthis.

STIPULATION THIRTEEN

The United States Government (“USG”) assessed that Muhammad Pahlawan was working for Shahab Mir’Kazei (also referred to as Shabab Rigi, Shebab Mirqazi, Shabab Meer Kazia, and Shabab Mirkaze’i). The USG also assessed that Shahab Mir’Kazei was an Iranian maritime facilitator from Zahedon, Iran, who owned multiple dhows and was associated with weapons smuggling operations in Chabahar.

In March 2017, the USG assessed that Shahab Mir’Kazei was an Iranian Businessman involved in the smuggling of weapons from Iran using Iranian fishing vessels. The USG assessed that Shahab Mir’Kazei was associated with telephone number 989159446791.

The USG assessed on February 1, 2024, that while the crew of the *Yunus* did not appear to be directly affiliated with the Islamic Revolutionary Guard Corps Qods Force (“IRGC-QF”), Mohammad Pahlawan was in contact with Shahab Mir’Kazei, and Shahab Mir’Kazei was affiliated with the IRGC-QF or has some IRGC-QF connections.

Defense Exhibit 73, the Exploitation Report, is admitted into evidence pursuant to this stipulation.

So stipulated.

Respectfully Submitted,

/s/ _____
Laura Koenig
Amy Austin
Jeremy Kamens
Jessica N. Carmichael, Esq.
Counsel for
Muhammad Pahlawan

/s/ _____
Troy A. Edwards, Jr.
Gavin R. Tisdale
Assistant United States Attorneys
United States Attorney’s Office
Joseph N. Kaster
Trial Attorney
National Security Division, CTS